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**From:** Malave, Maria [Malave.Maria@epa.gov]  
**Sent:** 8/8/2018 3:07:40 PM  
**To:** Lischinsky, Robert [Lischinsky.Robert@epa.gov]; Mia, Marcia [Mia.Marcia@epa.gov]  
**Subject:** issue with ADs addressing OIAI policy & on Rulemaking effort to revise NESHAP GPs to address OIAI policy change

**Importance:** High

Hi Rob and Marcia

I plan to address the following two issues with Amy (OGC) but wanted to get your input first since there is an ongoing rulemaking effort to revise the NESHAP GPs to address the OIAI policy change.

I am recommending that we take some interim steps since the rulemaking process is going to take some time. The two issues at this time are:

1. For the ongoing and subsequent ADI FRNS- I am recommending to not add any more OIAI ADs to the ADI. For the ongoing AD batch/FRN, this would mean to take out a R3 AD on OIAI policy.
2. I recommend also that for ADs already on the ADI, we add a disclaimer pointing to the new OIAI policy change per the January 2018 memorandum (not on ADI-we could add it), unless we want to wait until such policy is codified in the NESHAP GPs.

Thanks.

Maria